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**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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INA STEINER, DAVID STEINER, and STEINER  
ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY, INC., PROGRESSIVE F.O.R.C.E.  
CONCEPTS, LLC, DEVIN WENIG, STEVE  
WYMER, WENDY JONES, STEVE KRYSTEK,  
JIM BAUGH, DAVID HARVILLE, BRIAN  
GILBERT, STEPHANIE POPP, STEPHANIE  
STOCKWELL, VERONICA ZEA, PHILIP COOKE,  
JOHN AND JANE DOE,

Defendants.

Civil Action No. 1:21-cv-11181-PBS

REQUEST FOR HEARING

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**UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND TO AMENDED  
COMPLAINT PURSUANT TO A UNIFORM BRIEFING SCHEDULE GOVERNING  
DEFENDANTS**

Defendant Wendy Jones hereby files this unopposed motion to extend the deadline by which Ms. Jones must answer or otherwise respond to the Amended Complaint in this matter to April 21, 2023, consistent with the deadline recently set for other Defendants.

As grounds for this motion, Ms. Jones states as follows:

1. Plaintiffs filed their Amended Complaint on March 1, 2023. ECF 176.
2. Ms. Jones was not a party to this matter until Plaintiffs filed the Amended Complaint. ECF 176. A summons to Ms. Jones was issued on March 2, 2023.
3. On March 8, 2023, Defendant eBay Inc., on behalf of all Defendants who had appeared in the action, filed a motion to extend deadlines, exceed page limits, and file a reply brief. ECF 177. Ms. Jones had not appeared in the action at that time.

4. On March 10, 2023, the Court granted Defendant eBay Inc.'s motion to extend deadlines and denied eBay Inc.'s motion to exceed page limits. ECF 178. For Defendants who had entered an appearance by March 8, 2023, the deadline to answer or otherwise respond to Plaintiffs' Amended Complaint is now April 21, 2023. ECF 178.
5. Ms. Jones very recently retained Ropes & Gray LLP to represent her in this matter. The undersigned entered Notices of Appearance on behalf of Ms. Jones contemporaneously with this motion.
6. Plaintiffs' Amended Complaint runs over 122 pages. It alleges eleven causes of action against Ms. Jones.
7. Ms. Jones intends to file a motion to dismiss the Amended Complaint. Due to Ropes & Gray's recent retention, the significant number of allegations against Ms. Jones, and the substantial length and breadth of the Amended Complaint, additional time is necessary to prepare the motion to dismiss.
8. Ms. Jones thus requests that the Court extend the deadline for her response to the Amended Complaint to April 21, 2023, consistent with the deadline set for the other Defendants who have appeared in this matter.

As further grounds for this motion, undersigned counsel states that he has conferred with counsel for Plaintiffs as to the substance of this motion, and counsel has indicated that Plaintiffs do not oppose this motion.

WHEREFORE, Defendant Jones requests that the Court grant this motion and extend the deadline for Ms. Jones's response to the Amended Complaint to April 21, 2023, consistent with the schedule established for the other Defendants named in the Amended Complaint.

**REQUEST FOR HEARING**

Ms. Jones respectfully requests a hearing on this motion should the Court determine a hearing will be helpful to deciding the motion.

Dated: March 17, 2023

Respectfully submitted,

*/s/ Brien T. O'Connor*

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*Counsel for Wendy Jones*

**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

I, Brien O'Connor, counsel for Wendy Jones, hereby certify that, in accordance with Local Rule 7.1(a)(2), counsel for Wendy Jones has conferred with counsel for Plaintiffs, who do not oppose this motion.

Dated: March 17, 2023

/s/ Brien T. O'Connor  
Brien T. O'Connor

**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2023, I filed the foregoing Unopposed Motion to Extend Deadline to Respond to Amended Complaint Pursuant to a Uniform Schedule Governing Defendants using the CM/ECF system, and caused it to be served on all registered participants via the notice of electronic filing (the “NEF”). I further certify that a copy will be served to all non-registered participants by First Class Mail.

Dated: March 17, 2023

/s/ *Brien T. O'Connor*

Brien T. O'Connor